

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICK HARRISON, JOHN BUCKLEY III,  
MARGARET LOPEZ, ANDY LOPEZ,  
KEITH LORENSEN, LISA LORENSEN,  
EDWARDS LOVE, ROBERT MCTUREOUS,  
DAVID MORALES, GINA MORRIS,  
MARTIN SONGER, JR., SHELLY SONGER,  
JEREMY STEWARD, KESHA STIDHAM,  
AARON TONEY, ERIC WILLIAMS, CARL  
WINGATE, AND TRACY SMITH, as Personal  
Representative of the Estate of Rubin Smith,

Plaintiffs,

vs.

THE REPUBLIC OF SUDAN,

Defendant,

vs.

CREDIT AGRICOLE CORPORATE &  
INVESTMENT BANK,

Respondent.

Case No. 1:13-cv-03127 (AT)

**REPLY TO RESPONSES AND  
OBJECTIONS OF CREDIT AGRICOLE  
CORPORATE AND INVESTMENT BANK  
TO PLAINTIFFS' PETITION FOR  
TURNOVER ORDER**

Plaintiffs, Rick Harrison, John Buckley III, Margaret Lopez, Andy Lopez, Keith Lorensen, Lisa Lorensen, Edwards Love, Robert McTureous, David Morales, Gina Morris, Martin Songer, Jr., Shelly Songer, Jeremy Steward, Kesha Stidham, Aaron Toney, Eric Williams, Carl Wingate, and Tracy Smith, as Personal Representative of the Estate of Rubin Smith ("Plaintiffs" or "Petitioners"), file this reply to the responses and objections (the "Response") filed by Respondent Credit Agricole Corporate & Investment Bank ("Credit Agricole") to Plaintiffs' petition for turnover order.

In its Response, Credit Agricole objects to the turnover of certain accounts (the Objectionable Accounts, as defined in the Response) based on an appeal pending in the Second Circuit which could impact the determination of ownership interests in the Objectionable Accounts. Credit Agricole does not object to the turnover of certain other accounts (the Unobjectionable Accounts, as defined in the Response). Credit Agricole requests that the Court stay the proceedings as to the Objectionable Accounts. Credit Agricole has represented to Plaintiffs that, should the Second Circuit enter a decision that does not preclude the turnover of the Objectionable Accounts, it would turn over those funds without any conditions precedent, such as a notice protocol. Based on this representation, Plaintiffs agree to a stay of the turnover of the Objectionable Accounts. Plaintiffs and Credit Agricole have agreed to the form of a proposed Turnover Order attached hereto as Exhibit A. Plaintiffs respectfully request that the Court enter the proposed Turnover Order.

Dated: January 2, 2014



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*Attorneys for Plaintiffs/Petitioners*

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the forgoing was filed electronically on the Court's ECF System and delivered via U.S. mail on this 2nd day of January, 2014 to:

Republic of Sudan  
Ali Ahmed Karti  
Minister of Foreign Affairs  
Embassy of the Republic of Sudan  
2210 Massachusetts Avenue NW  
Washington, DC 20008

Chief Counsel  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, D.C. 20220

/s/ Edward H. Rosenthal